

ETHYL PETROLEUM ADDITIVES DIVISION



157479

INTER-OFFICE

To R.A. PHILLIPS
H.P. PFISTER
J.A. SCHULTZ

ADDRESS

FROM J.L. SPARKS

ADDRESS

SUBJECT EXCEPTIONS TO NO DIG ORDER IN PLANT

DATE June 19, 1985

We have finally received a response from the Federal EPA in response to our many requests for project approval and freeing of certain sections of the plant from further 2,3,7,8,TCDD sampling requirements.

We have received formal approval to proceed with the NT project with two conditions -

- 1.) We must notify the agency when work is scheduled to begin as they will be making a site visit during the project work.
- 2.) Equipment, once decontaminated, should not be allowed to reenter the "Significantly Contaminated" area.

On the attached drawing, a significant portion of the plant is shown with diagonal lines. This section is "released" for construction projects and does not require additional sampling, etc. Projects in these areas may proceed in a normal manner. It should be noted however that the Administrative order prohibits removing of any soils from the plant. The smaller center section of the plant is shown with crossed diagonal lines. This section is what the FEPA refers to as the "Significantly Contaminated" area. No projects, construction, etc. involving movement or digging of soil can be undertaken in this area without prior EPA approval.

The remaining section of the plant is considered "undetermined" (as far as 2,3,7,8, TCDD contamination). Work, projects, etc. in this area will require review and most probably, sampling, prior to a decision to proceed.

The remaining square in the NW corner of the plant reflects the location of 2,3,7,8,TCDD, contaminated soil being held under protective cover. This area is prohibited to all activities.

If you have any questions or require clarification, please contact me.

H.P. PFISTER
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The asphaltting project at the corner of Falling Springs and 2nd Street should not proceed at this point in time. A separate letter granting approval should be received from the FEPA shortly.


J.L. SPARKS

tmb

JLS:0035-85

cc: S. McWILLIAMS
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